KELLEY DRYE & WARREN LLP
A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400
3050 K STREET, NW
WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE
(202) 342-8451
www.kelleydrye.com

NEW YORK, NY
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

DIRECT LINE: (202) 342-8640
EMAIL: ckoves@kelleydrye.com

February 28, 2011

VIA ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: 2011 Annual Customer Proprietary Network Information Compliance Certification; EB Docket No. 06-36

Dear Secretary Dortch:

Please find attached the 2011 Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for One World Telecom, LLC and Yo Llamo, LLC.

Please contact the undersigned if you have any questions regarding this filing.

Respectfully Submitted,

Christopher S. Koves
Counsel to One World Telecom, LLC
and Yo Llamo, LLC

Attachment

DC01/KOVEC/440653.7

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010.

Name of Companies:	One World Telecom, LLC Yo Llamo, LLC
Form 499 Filer ID:	One World Telecom, LLC: 824860 Yo Llamo, LLC: 827252
Name of Signatory:	Jorge Asecio
Title of Signatory:	President

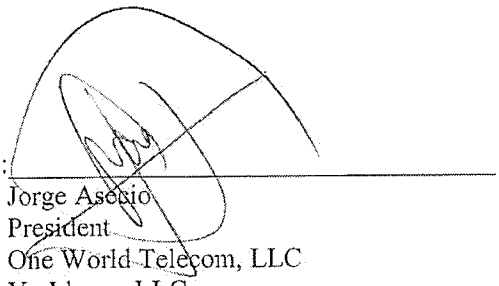
I, Jorge Asecio, certify that I am an officer of One World Telecom, LLC ("One World") and Yo Llamo, LLC ("Yo Llamo) (collectively, the "Companies") and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's" or "FCC's") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Companies' procedures ensure that the Companies are in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules. *See* 47 C.F.R. § 64.2009(e).

The Companies have not taken any actions (*i.e.* instituted proceedings or filed petitions at either state commissions, the court system, or at the FCC) against data brokers during the above referenced certification period. The Companies have no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the Companies have taken to protect CPNI include updating their CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

The Companies have not received any customer complaints during the above referenced certification period concerning the unauthorized release of CPNI.

Date: Feb 28 2011

Signed: 

Jorge Asecio
President
One World Telecom, LLC
Yo Llamo, LLC

STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

One World Telecom, LLC and Yo Llamo, LLC (collectively, "the Companies") have established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("Commission's" or "FCC's") rules pertaining to customer proprietary network information ("CPNI") set forth in Sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

Safeguarding against pretexting

- The Companies take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Companies are committed to notify the FCC of any novel or new methods of pretexting they discover and of any actions they take against pretexters and data brokers.

Training and discipline

- The Companies train their supervisory and non-supervisory personnel in an effort to ensure that their employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out the Companies' obligations to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, (d) obtain customers' informed consent as required with respect to its use for marketing purposes, and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.

- The Companies' employees are required to review the Companies' CPNI practices and procedures outlined in the Code of Conduct and to acknowledge their comprehension thereof.

- The Companies have an express disciplinary process in place for violation of the Companies' CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

The Companies' use of CPNI

- The Companies may use CPNI for the following purposes:

  - To initiate, render, maintain, repair, bill and collect for services;
  - To protect their property rights; or to protect their subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
  - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
  - To market services formerly known as adjunct-to-basic services; and
  - To market additional services to customers *with the receipt of informed consent via the use of opt-in or out-out, as applicable.*

- The Companies do not disclose or permit access to CPNI to track customers that call competing service providers.

- The Companies disclose and permit access to CPNI where required by law (*e.g.*, under a lawfully issued subpoena).

Customer approval and informed consent

- The Companies do not use CPNI for marketing purposes. The Companies also do not share, sell, lease, or otherwise provide CPNI to any of their affiliates, suppliers, vendors, or any third parties for any type of service for marketing purposes. If the Companies change this policy, they will implement a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system also will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI. Records of approvals will be maintained for at least one year.

  One time use

  - After authentication, the Companies may use oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice will comport with Section 64.2008(f) of the FCC's rules.

Additional safeguards

- The Companies require supervisory approval for all marketing campaigns and maintain for at least one year records of such marketing campaigns, including a description of each campaign, the products offered as part of the campaign, and details of what information is used in connection with the campaign.

- The Companies designate one or more officers, as an agent or agents of the companies, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in Section 64.2009(e) of the FCC's rules.

- For customer-initiated telephone inquiries regarding or requiring access to CPNI, the Companies authenticate the customer (or its authorized representative), through a dedicated account representative and a contract that specifically addresses the Companies' protection of CPNI. In the event a customer does not have a dedicated account representative, the Companies will authenticate the customer without prompting through the use of readily available biographical or account information, such as through the use of a pre-established password. If the customer cannot provide sufficient authentication, then the Companies only disclose call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.

- The Companies do not permit online customer access to CPNI, nor do they have retail locations where customers may request access to CPNI.

- The Companies notify customers immediately of any account changes, including address of record, authentication, and password related changes.

- Within seven (7) days of a reasonable determination of a breach of CPNI, the Companies will notify the U.S. Secret Service and the Federal Bureau of Investigation of the breach via the central reporting facility www.fcc.gov/eb/cpni. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs the Companies to delay notification, or the Companies and the investigatory party agree to an earlier notification. The Companies will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.